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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ADRIAN ROMERO;
Plaintiff,

vs.

COUNTY OF LOS ANGELES, a
Public Entity; SERGIO CAMPOS;
DAMIEN GUERRERO; AND
JUSTIN PEREZ; and DOES 1 through
10, inclusive;

Defendants.

CASE NO.: 2:23-cv-02025-GW-PVC
[Hon. George H. Wu]

**JOINT REPORT RE STATUS OF
SETTLEMENT**

TO THIS HONORABLE COURT:

Plaintiff ADRIAN ROMERO (“Plaintiff”), and COUNTY OF LOS ANGELES; SERGIO CAMPOS; DAMIEN GUERRERO; and JUSTIN PEREZ (“Defendants,” collectively “the Parties”), by and through their respective counsel, hereby submit the following joint status report regarding settlement.

RECITALS

1. On January 12, 2024, the parties participated in a mediation with ADR Panel Mediator Richard Copeland and all parties reached a settlement agreement to resolve the matter in its entirety. The Parties signed a stipulation for settlement on that date.

2. The settlement is conditioned upon the approval by the relevant Los Angeles County boards, including the Los Angeles County Claims Board and the Board of Supervisors, which defense counsel will be recommending. As previously advised, the process of obtaining approvals from the Los Angeles County Claims Board and Board of Supervisors is expected to take 9-12 months from the date the settlement agreement is fully executed by the parties.

3. Plaintiff received the draft of the settlement agreement from Defense Counsel on March 21, 2024. The County received the executed settlement agreement from Plaintiff on June 12, 2024.

4. The Los Angeles County Board of Supervisors has established protocols in lawsuits. Where the liability of the settlement or judgment exceeds \$100,000, a Corrective Action Plan (CAP) (a confidential document) and a Summary Corrective Action Plan (SCAP) (a public record) must be produced.

5. After the subject settlement agreement was fully executed, the settlement moved on to the CAP phase. The CAP process involves several steps in its preparation, including investigation, drafting, and revisions, followed by approval of multiple levels of LASD personnel. The County is in the CAP process phase of the approvals process.

1 Most recently, the draft CAP was reviewed by the CEO and returned to the Los Angeles
2 Sheriff's Department for revisions.

3 6. The CAP review process has been completed.

4 7. The matter went before the Claims Board on May 5, 2025, and was approved.

5 8. The matter is expected to go before the Board of Supervisors within
6 approximately 60 days. After the County Board of Supervisors' approval, the settlement
7 documents and Plaintiff's payment instructions will be submitted to the Los Angeles
8 County Auditor-Controller, and then the settlement payment will be issued.

9 9. The Parties request the Court allow additional time for the settlement
10 approval process to proceed.

11 10. Accordingly, the parties request that the Court continue the status
12 conference to a date falling in approximately three (3) months so that the parties may
13 update the Court regarding the status of the approval of the settlement.

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16 Respectfully Submitted,

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18 DATED: May 13, 2025

LAW OFFICES OF DALE K. GALIPO

19 By: /s/ Dale K. Galipo

20 Dale K. Galipo

21 Renee V. Masongsong

Attorneys for Plaintiff

22 DATED: May 13, 2025

HURRELL CANTRALL LLP

23
24 By: /s/ Katherine E. Orletsky

25 THOMAS C. HURRELL

26 KATHERINE E. ORLETSKY

27 Attorneys for Defendants
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